

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Uniloc 2017 LLC

Plaintiff

v.

Apple Inc.,

Defendant

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Case No. 6:19-cv-532

PATENT CASE

Jury Trial Demanded

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO
DEFENDANT APPLE INC.’S MOTION TO TRANSFER VENUE**

Plaintiff Uniloc 2017 LLC (“Uniloc”) respectfully moves the Court for an order extending the time for Uniloc to file its brief in response to defendant Apple Inc.’s (“Apple”) Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (Dkt. No. 15). Uniloc’s current deadline to file its response brief is November 19, 2019. Uniloc seeks to extend the deadline to November 22, 2019.

On November 12, 2019, Apple filed its Motion to Transfer Venue of this case to the Northern District of California. Since November 13, 2019, counsel for Uniloc and Apple have conferred multiple times via email and by telephone concerning: 1) Uniloc’s request for an extension to file its response brief; 2) Uniloc’s request that Apple agree that certain venue discovery may be conducted in this case; and 3) Uniloc’s request that Apple produce promptly the venue discovery (e.g., deposition transcripts, interrogatory responses, document productions) that was produced, exchanged, or designated in other Uniloc cases against Apple to Uniloc’s counsel in this case (or alternatively, that Apple consent to Uniloc’s counsel in these other cases to share the prior venue discovery with Uniloc’s counsel in this case).

Uniloc seeks this extension to allow for the parties to continue their negotiations concerning venue discovery in this case, the briefing schedule, and the timing and scope of Uniloc counsel's access to the prior venue discovery taken in the other Uniloc cases. Uniloc seeks this extension not for delay but for good cause and that justice may be served. If the parties' negotiation results in an impasse, Uniloc anticipates that it will seek the Court's guidance. Uniloc agrees that it will not use this extension or the fact that case activity has occurred during this process as a basis to resist transfer.

Further, counsel for Uniloc conferred with counsel for Apple, and Apple does not oppose the relief requested in this motion.

Wherefore, Uniloc respectfully requests that the Court order that the date by which Uniloc must respond to Apple's Motion to Transfer be extended until and including November 22, 2019.

Respectfully Submitted,

By: /s/ William E. Davis, III
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**Counsel for Plaintiff Uniloc 2017
LLC**

CERTIFICATE OF CONFERENCE

I certify that counsel for the parties met and conferred with respect to this motion as required by Local Rule CV-7(h) on November 19, 2019 via email and/or telephone conference and defendant Apple does not oppose this motion.

/s/ William E. Davis, III
William E. Davis, III

CERTIFICATE OF SERVICE

The undersigned certifies that on this 19th day of November 2019, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ William E. Davis, III
William E. Davis, III